
**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRANDON M. WILBORN,	:	
Plaintiff	:	
	:	Civil Action No. 5:18-CV-3597
v.	:	
	:	
WILLIAM BARR,	:	Judge Jeffrey L. Schmehl
Attorney General of the	:	
United States, <i>et al.</i>,	:	
Defendants.	:	

**JOINT MOTION TO EXTEND THE STAY
FOR ATTORNEY FEES AND COSTS**

The Parties respectfully move this Court to extend, for 30 additional days, the stay granted to Plaintiff Wilborn to file a request for attorney fees and costs (Doc. 35), while the Parties attempt to obtain final approval of an agreed-upon settlement in principle. In support of this motion, the Parties respectfully state as follows:

1. On September 30, 2020, the Court issued an order granting the joint request to stay any requirement for Plaintiff Wilborn to file a request for attorney fees and costs, for a total of 135 days (*i.e.* until March 8, 2021), if no appeal was taken. *See*, Doc. 35.
2. No appeal was taken in this matter.
3. The Parties have been working diligently to resolve the issue of Plaintiff Wilborn's request for attorney fees and costs and have reached an agreement in principle.
4. The Parties are now awaiting final approvals from various federal agencies.
5. As the current stay expires on Monday, March 8, 2021 and the Parties believe that it would promote the efficient use of the Court's and the Parties' resources to resolve this matter amicably, the Parties respectfully request that this court extend the stay for 30 additional days

from March 8, 2021; *i.e.* through Wednesday, April 7, 2021.

WHEREFORE, the Parties respectfully request that the Court grant their joint motion to extend, by an additional 30 days, the stay granted by this Court. A proposed order is attached hereto.

Respectfully submitted,

/s/ Joshua Prince
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Date: March 2, 2021